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FACSIMILE TRANSMITTAL SHEET

TO:	Examiner William S. Powers	FROM:	Craig G. Holmes
COMPANY:	U.S.P.T.O.	DATE:	APRIL 25, 2006
FAX NUMBER:	571 273 8573	TOTAL NO. OF PAGES INCLUDING COVER:	9
PHONE NUMBER:	571-272-8573	SENDER'S REFERENCE NUMBER:	50325-0598
RE:	Interview Request	YOUR REFERENCE NUMBER:	10/040,050
<input type="checkbox"/> URGENT <input checked="" type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> PLEASE RECYCLE			

Examiner Powers,

As you requested in the phone message that you left today following our earlier phone conversation, please find attached the Applicant Initiated Interview Request Form with a proposed date/time of Friday, April 28, 2006, at 2:00 PM EST (11:00 AM PST).

If the Examiner grants this request for an Interview, but the proposed date and time are not acceptable, the Applicant respectfully requests that the Examiner propose an alternate date and time, keeping in mind that the Applicant is located in California and the 3 hour earlier time difference resulting therefrom. Thus, the Applicant would prefer to conduct the Interview during the later morning or afternoon of the Examiner's time.

Also, as you requested, please find the attached discussion of arguments that the Applicant would like to discuss during the Interview. Please note that the Applicant is not proposing any claim amendments at this time and rather wishes to focus the interview on the basis of the rejections provide in the Final Office Action.

Respectfully submitted,

Craig Holmes
Reg. No. 44,770

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PTOL-413A (08-04)

Approved for use through 07/31/2006. OMB 0651-0031
U.S. Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE

Applicant Initiated Interview Request Form

Application No.: 10/040,050 First Named Applicant: Mahesh S. Maddur
 Examiner: William S. Powers Art Unit: 2134 Status of Application: Final OA mailed 3/1/06

Tentative Participants:

(1) Ex. Powers (2) Craig Holmes
 (3) _____ (4) _____

Proposed Date of Interview: Friday, April 28, 2006 Proposed Time: 2:00 (AM/PM) EST
(11:00 AM PST)

Type of Interview Requested:

(1) ☒ Telephonic (2) ☐ Personal (3) ☐ Video Conference

Exhibit To Be Shown or Demonstrated: ☐ YES ☒ NO

If yes, provide brief description: _____

Issues To Be Discussed

Issues (Rej., Obj., etc)	Claims/ Fig. #s	Prior Art	Discussed	Agreed	Not Agreed
(1) <u>102(b) Rej.</u>	<u>Claim 5</u>	<u>Maccaoché</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) <u>103(a) Rej.</u>	<u>Claims 1, 2, 3, 4</u> <u>12, 14, 15, 16</u>	<u>Maccaoché + "Admitted prior art"</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(3) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(4) _____	_____	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

☐ Continuation Sheet Attached

Brief Description of Arguments to be Presented:

See attached sheet.

An interview was conducted on the above-identified application on _____.

NOTE: This form should be completed by applicant and submitted to the examiner in advance of the interview (see MPEP § 713.01).

This application will not be delayed from issue because of applicant's failure to submit a written record of this interview. Therefore, applicant is advised to file a statement of the substance of this interview (37 CFR 1.133(b)) as soon as possible.

Craig Holmes
 Applicant/Applicant's Representative Signature

 Examiner/SPE Signature

Craig B. Holmes
 Typed/Printed Name of Applicant or Representative

44, 770
 Registration Number, if applicable

This collection of information is required by 37 CFR 1.133. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to take 21 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

If you need assistance in completing the form, call 1-800-PTO-9199 and select option 2.

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Attachment for "Applicant Initiated Interview Request Form"

Description of Arguments to be Presented:

The following description of the arguments is preceded by an example embodiment of Claim 1, as previously provided in the response to the previous Office Action, which the Examiner may find helpful in understanding the later presented issues. Following the example embodiment of Claim 1, the following three issues are addressed: (1) the feature of a prime modulus (as included in all the claims), (2) the feature of modular exponentiation (as included in all the claims), and (3) the use of a power value that is equal to two less than the prime modulus (as included in Claims 1-4 and 12-16) being rejected upon Euler's Theorem as "admitted prior art."

Example Embodiment of Claim 1

The features of Claim 1 correspond to an implementation of expression (23) in the application, namely $a^{p-2} = a^{-1} \bmod p$, in which a modulo multiplicative inverse, $a^{-1} \bmod p$, is determined based on modulo exponentiation, $a^{p-2} \bmod p$, with p being chosen to be a **prime modulus**. The approach of Claim 1 is implemented using a **modulo exponentiation** block, which avoids the problems of using the extended Euclidean algorithm (EEA) that is an iterative approach and slow for large numbers, which is today common with key sizes of 1024, 2048, or even more bits. As explained in the Application, EEA is typically implemented as a multiplicative inverse (MI) block through application specific integrated circuits (ASICs), that occupy a large area of chip "real estate." (Application, pages 3-4.)

However, in the approach of Claim 1, existing blocks, such as a **modulo exponentiation** (ME) block, can be used that have smaller area requirements when implemented on a chip. This improvement is at the "expense" of requiring that the modulus be a prime modulus, which is required in deriving Equation (23) as illustrated in the Application, although such an expense is generally outweighed by the result of being able to calculate a multiplicative inverse using modular exponentiation in lieu of an ASIC that implements the larger and more time consuming MI circuitry.

Specifically in Claim 1, the **modulo exponentiator** block is used in "determining a multiplicative inverse of the first integer data value modulo a prime modulus by computing a first quantity modulo the **prime modulus** data value." For example, the first integer data value is the value for which the multiplicative inverse is desired, such as "a" in expression (23) of the application. The prime modulus is "p" in expression (23).

Next in Claim 1, the "first quantity equals, modulo the **prime modulus** data value, the first integer data value raised to a **power of a second quantity**." For example, the first quantity is "a" in expression (23) modulo the prime modulus "p" raised to the power of the second quantity.

Then in Claim 1, the "**second quantity is two less than the prime modulus data value**." For example, the second quantity is the exponent of expression (23), namely "p-2" or two less than the prime modulus.

Issue 1 – Use of a Prime Modulus

All of the claims feature the use of a prime modulus, yet the Applicant is unable to find where a prime modulus is mentioned in the cited portions of *Naccache*, although other portions of *Naccache* do refer to a prime modulus. As the Final Office Action currently stands, it does not appear to the Applicant that prima facie rejections have been established with respect to the "prime modulus" feature of the claim since none of the cited portions of *Naccache* disclose a prime modulus. Therefore, the Applicant would like to clarify with the Examiner during the Interview what the basis is for the "prime modulus" feature of the claims to ensure that this feature has not been overlooked in establishing the rejections of the Final Office Action.

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For example, the rejections of Claims 1, 5, 14 and 15 cites Col. 4, lines 45-48 and Figure 2 with respect to the portion of the claims referring to a prime modulus, yet neither Col. 4, lines 45-48 nor Figure 2 discloses a prime modulus. In fact, in that cited portions of Naccache, there is only a reference to using a modulus "n" that is not described as being a prime modulus.

While the Applicant notes that other portions of Naccache refer to the use of a prime modulus "p" in the DSA scheme (see Col. 5, lines 41-42, for example), the Final Office Action's rejections do not cite those portions of Naccache referring to the prime modulus "p." Thus, the Applicant would like to discuss the basis of the Final Office Action's rejection with respect to the prime modulus feature of the claims, and specifically which portion(s) of Naccache is being relied upon as disclosing the "prime modulus" feature of the claims.

Issue 2 – Use of a Modular Exponentiation Block/Function

All of the claims feature modular exponentiation, such as by using a "modulo exponentiation block" or a "modulo exponentiation function." Yet the Final Office Action appears to only cite to Figure 2 of Naccache for this feature of the claims. Yet Figure 2 only discloses a CPU 30 that is illustrated as including "programs or computational resources corresponding to or implementing...exponentiation." (Figure 2; Col. 4, lines 25 – 34). The same is true with respect to Figure 1 of Naccache and the discussion of CPU 11 illustrated thereon as having "modular reduction" but only "exponentiation" (see Col. 3, lines 52-60).

While Figures 1 and 2 and the above cited portions of Naccache refer to "modular reduction" and Figure 2 and its description also referring to "modular inversion," there is no illustration, description, or reference to "modular exponentiation" anywhere within Naccache that the Applicant has been able to locate by either reading and reviewing the reference or performing electronic searches therein. Rather, as far as the Applicant has been able to determine, Naccache only refers to "exponentiation" without characterizing it as being modular. And as discussed in the previous Office Action response, a circuit for performing exponentiation is not the same as a circuit that performs modular exponentiation.

Thus, given that Naccache expressly refers to "modular inversion" and "modular reduction," yet only refers to "exponentiation," the Applicant fails to see any disclosure within Naccache of either a "modulo exponentiation block" or a "modulo exponentiation function" as featured in the Claims. Therefore, the Applicant would like to discuss with the Examiner the basis within Naccache for the Final Office Action's rejection with respect to the "modulo exponentiation block/function" as featured in the claims.

Issue 3 – Characterizing Equation (23) of the Application as "Euler's Theorem" & Applicant Admitted Prior art

Claims 1-4 and 12-16 feature the use of an exponent that is equal to the value of "the prime modulus less two," a value "two less than the prime modulus" value, or similar variations thereof. The Final Office Action rejects this feature of Claims 1-4 and 12-16 based on the alleged "Applicant admitted prior art," namely Euler's Theorem as presented in paragraph 43 of the Specification of the Applicant's disclosure. However, for the reasons outlined below, the Applicant respectfully submits that characterizing the entire content of paragraph 43 as Euler's Theorem is incorrect.

In paragraph 43 of the Applicant's specification, a derivation of Equation 23 is presented. The derivation begins with a statement of Euler's Theorem, namely that for two positive numbers "a" and "b" that are relatively prime (e.g., their greatest common denominator is 1, which is often expressed as $\gcd(a,b)=1$), the following relation is true: $a^{\phi(b)} = 1 \pmod{b}$. This equation-based representation of Euler's Theorem is identified in the specification as Equation (21).

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Note that "relatively prime" means that the only common denominator between two numbers is 1, but that this does not mean that either number is prime itself. For example, the numbers "3" and "4" are relatively prime because the greatest common denominator between "3" (with denominators of 1 and 3) and "4" (with denominators 1, 2, and 2) is "1." Yet "4" is clearly not prime as the factors of 4 are 1, 2, and 2, with "2" being repeated, meaning that "4" is not a prime number (e.g., a number that is only divisible by "1" and itself).

Thus, the Applicant would agree that Equation (21) of the specification may be characterized as Euler's Theorem. This is consistent with other descriptions of Euler's Theorem, as indicated in the attached examples, and no doubt in other examples that could be found in performing a search of "Euler's Theorem." Note that in the presentation of Euler's Theorem in the specification, which is consistent with the examples provided, the only restrictions on "a" and "b" is that both be a positive number and that "a" and "b" are relatively prime with respect to each other.

The derivation of paragraph 43 then proceeds from Euler's Theorem, represented by Equation (21), as the starting point to reach Equation 22, which is a manipulation of Equation (21) to determine an expression that relies upon modular exponentiation. Note that the use of modular exponentiation in Equation (22) is unlike the statement of Euler's Theorem in Equation (21) that does not involve modular exponentiation. Thus, the Applicant disagrees with the Final Office Action's characterization of Equation (22) as being part of "Euler's Theorem" since the inclusion of modular exponentiation in Equation (22) is different than in Equation (21) that lacks any modular exponentiation.

Then in finally deriving the expression identified as Equation (23) in the specification, the derivation assumes that "b" is equal to a positive prime number. It is only with this further limitation/restriction that the function $\phi(b)$ is equal to "p-1", and thus " $\phi(b)-1$ " becomes "p-2" as shown in Equation (23). As a result of the expression of Equation (23), it can be observed that a modular multiplicative inverse can be obtained through the use of modular exponentiation, which is not the case with Euler's Theorem in Equation (21).

Therefore, Equation (23) is clearly and unambiguously different than Euler's Theorem, as represented by Equation (21), because Euler's Theorem only requires "b" be a positive number, whereas Equation (23) requires that "p" be a positive prime number and be relatively prime with respect to "a." As a result, the Applicant respectfully disagrees with the Final Office Action's characterization that all of paragraph 43 of the specification is Euler's Theorem and therefore "admitted prior art." Rather, the Applicant respectfully submits that only Euler's Theorem, as represented by Equation (21), is properly characterized as prior art with the remainder of paragraph 43, including both Equations (22) and (23), not being prior art.

In fact, the rejection of Claims 1-4 and 12-16 on the basis of Equation (23) effectively is a rejection of the Applicant's claims on the Applicant's own invention, as represented by Equation (23), which the Applicant respectfully submits is improper.

Conclusion

The Applicant respectfully requests that the Applicant's request for an Examiner Interview be granted so that the basis of the rejections of the claims with respect to the "prime modulus" and "modulo exponentiation" features of the claims can be explained to the Applicant. In particular, with regards to the "modulo exponentiation" feature of the claims, the Applicant is unable to find anything in Naccache that discloses this feature, and the Applicant would appreciate the Examiner providing a description of what is being relied upon as disclosing modular exponentiation.

Also, the Applicant believes that discussing the alleged "Applicant admitted prior art" of Euler's Theorem as presented in Equation (21) of paragraph 43 of the specification would be beneficial to the Examiner in understanding that while Equation (21) may be characterized as "Euler's Theorem," Equation (23) is not properly characterized as "Euler's Theorem" since Equation (23) requires a restriction to a prime modulus that is not part of Euler's Theorem.



US005742534A

United States Patent [19]

Modiġ

[11] Patent Number: 5,742,534

[45] Date of Patent: Apr. 21, 1998

- [54] ELECTRONIC CIRCUIT FOR MODULAR COMPUTATION IN A FINITE FIELD**

5,602,767 2/1997 Ferrweis et al. _____ 364/746.1

FOREIGN PATENT DOCUMENTS

[75] Inventor: Guy Monler, Rognac, France

0145533 6/1985 European Pat. Off.

0591158	3/1993	European Pat. Off.
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[73] Assignee: SGS-Thomson Microelectronics, S.A.,
Gentilly, France

0601907	6/1994	European Pat. Off.
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Primary Examiner—David H. Malzahn

Attorney, Agent, or Firm—Robert Groover, Betty Formby; Matthew Anderson

[21] Appl. No.: 531,952

[22] Filed: Sep. 21, 1995

[30] Foreign Application Priority Data

Sep. 21, 1994 [FR] France ***** 94 11420

[S1] Int. CL⁶ G06F 7/72

[52] U.S. Cl. 364/746.1

[58] Field of Search 364/146.1, 754,
364/757

[56] **References Cited**

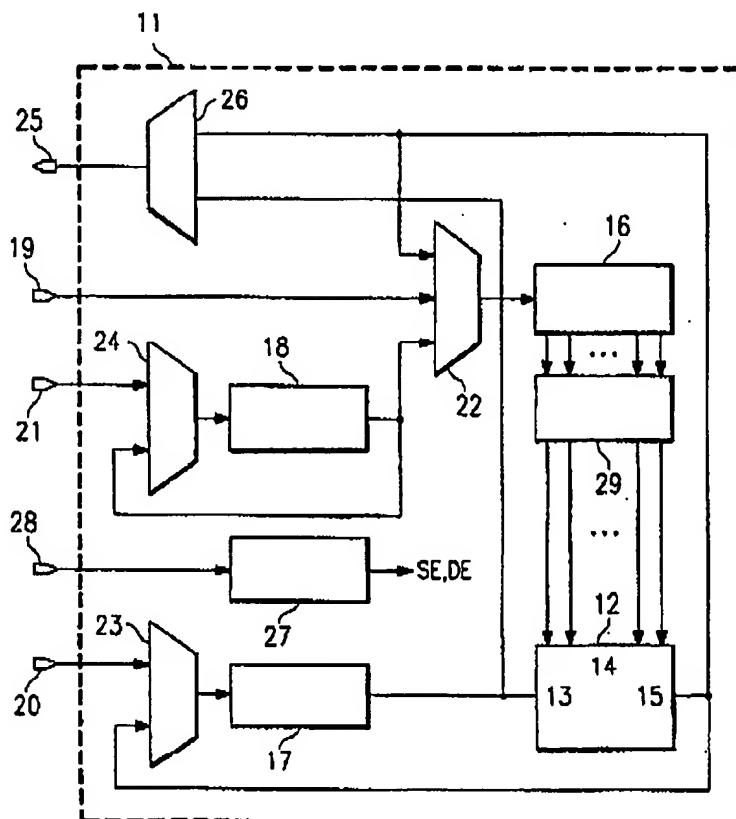
U.S. PATENT DOCUMENTS

5,513,133 4/1996 Cressal et al. 364/754
5,535,225 7/1996 Mayhew et al. 364/746.1

[57] ABSTRACT

An electronic computation circuit comprises a multiplication operator with a serial input, a parallel input and a serial output, a first register connected by its output to the parallel input of the operator, a second register connected by its output to the serial input of the operator, a third register and a multiplexing circuit to selectively connect at least one data input terminal and the output of the operator to the inputs of the first, second and third registers, and to produce the output of the electronic multiplication circuit. Application to the operations of multiplication, squaring, exponentiation and modular inversion on a finite field denoted $GF(2^n)$.

34 Claims, 3 Drawing Sheets





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Euler's theorem

Date: 7/2/96 at 13:46:32

From: Anonymous

Subject: Euler's Theorem

I am not sure how to find the inverse of a modulo m using Euler's theorem. Using the formula of my book, I end up just getting a. The answers I get are also not what the book has as the answers. Any hints would be appreciated.

Date: 7/2/96 at 17:30:44

From: Doctor Anthony

Subject: Re: Euler's Theorem

Euler's theorem states that if $(a, m) = 1$ (i.e. a and m are relatively prime), then $a^{\phi(m)} \equiv 1 \pmod{m}$ where $\phi(m)$ is the number of integers less than m and prime to it. *e.g., $a^{\phi(m)} = 1 \pmod{m}$*

*Euler's
Theorem*

If $\phi(m) = n$ then $a^n \equiv 1 \pmod{m}$

So $a \cdot a^{(n-1)} \equiv 1 \pmod{m}$ but $a \cdot a^{(-1)} \equiv 1 \pmod{m}$

and so $a^{(-1)} \equiv a^{(n-1)} \pmod{m}$

-Doctor Anthony, The Math Forum

 Check out our web site! <http://mathforum.org/dr.math/>

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